

MARK J. BOURASSA, ESQ. (NBN 7999)
JENNIFER A. FORNETTI, ESQ. (NBN 7644)
VALERIE S. CHRISTIAN, ESQ. (NBN 14716)
THE BOURASSA LAW GROUP
2350 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89102
Telephone: (702) 851-2180
Facsimile: (702) 851-2189
Email: *mbourassa@blgwins.com*
jfornetti@blgwins.com
vchristian@blgwins.com

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

STEVEN WADE, an individual,

Plaintiff,

vs.

C AND S COMPANY INC., a domestic
corporation, and DOES 1 – 20 inclusive,

Defendants.

Case No.: 2:24-cv-01561-RFB-MDC

**STIPULATION AND ORDER TO EXTEND
DISCOVERY**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 26(f), and District of Nevada Civil Local Rules, 6-1 and 26-3 and for good cause described herein, the parties, Plaintiff Steven Wade, and Defendant C and S Company Inc., (“Defendant”) by and through their respective counsel of record, hereby request this Honorable Court to adopt and approve this stipulated extension to the discovery plan, and continue the discovery deadlines for 90 days as requested herein:

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I. LOCAL RULE 6-1 IS SATISFIED

This is the first request for an extension of discovery deadlines filed by the parties. Pursuant to the Order dated September 30, 2024, the following dates govern for purposes of discovery:

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|--|-------------------|
| 1. Discovery Cutoff Date: | February 19, 2025 |
| 2. Motions to amend pleadings and add parties: | No Extension |
| 3. Expert Designations: | December 23, 2024 |
| 4. Rebuttal Expert Designations: | January 20, 2025 |
| 5. Dispositive Motions: | March 21, 2025 |
| 6. Joint Pre-Trial Order: | April 21, 2025 |

The parties have been diligently pursuing discovery on all aspects of the case and are working in good faith to reach an amicable resolution. However, due to a family emergency, Plaintiff's counsel needed to suddenly, and unexpectedly, become her mother's primary caregiver on hospice care on September 25, 2024, with her mother passing away on October 6, 2024. This was also Plaintiff's last parent and there were many arrangements to be made, including flying her mother's remains flown back and laid to rest in Wisconsin where her father is already buried, rehoming animals, and settling other matters. Plaintiff's counsel's other full time Nevada attorney with experience went on maternity leave on November 2, 2024 and the seasoned attorney hired to assist left four and a half days later. Due to unforeseen circumstances, the parties are requesting a 90-day extension to the remaining discovery deadlines.

The instant request comports with Local Rule 6-1, in that no request is being made after the expiration of the specified period.

II. LOCAL RULE 26-3 IS SATISFIED

The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-3. This request is made within 21 days of the subject deadline and is supported by a showing of good cause.

The parties agree that the extension requested is made in good faith and will allow for the additional fact discovery to be completed before the upcoming proposed deadlines. As a result, the parties have requested the remaining discovery deadlines be extended 90 days.

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Discovery Completed to Date:

Plaintiff's Initial Disclosures September 23, 2024

Defendant's Initial Disclosures September 24, 2024

Discovery Remaining:

The parties still need to take depositions of the parties and fact witnesses. The parties still need to serve written discovery. Additionally, the parties need to prepare expert reports, rebuttal reports, and take the depositions of those experts.

Proposed Schedule for Completing All Remaining Discovery:

Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting an additional 90 days be afforded for discovery.

The following deadlines are requested.

1. Discovery Cutoff Date: May 20, 2025
2. Motions to amend pleadings and add parties: No Extension
3. Expert Designations: March 21, 2025
4. Rebuttal Expert Designations: April 21, 2025 (next business day)
5. Dispositive Motions: June 19, 2025
6. Joint Pre-Trial Order: July 21, 2025 (next business day)

DATED this 2nd day of December 2024

DATED this 2nd day of December 2024

THE BOURASSA LAW GROUP

SNELL & WILMER LLP

By: /s/ Jennifer A. Fornetti

By: /s/ Paul S. Prior

MARK J. BOURASSA, ESQ. (NBN 7999)
JENNIFER A. FORNETTI, ESQ. (NBN 7644)
VALERIE S. CHRISTIAN, ESQ. (NBN 14716)
2350 W Charleston Blvd, Suite 100
Las Vegas, Nevada 89102

BRADLEY T. AUSTIN, ESQ. (NBN 13064)
PAUL S. PRIOR, ESQ. (NBN 9324)
THERESA C. TRENHOLM, ESQ. (NBN 16460)
1700 South Pavilion Center Drive, Ste. 700
Las Vegas, Nevada 89135

Attorneys for Plaintiff

Attorneys for Defendant

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 12-3-24

CASE NO.: 2:24-cv-01561-RFB-MDC

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of The Bourassa Law Group, and that on this date I caused to be served a true copy of **STIPULATION AND ORDER TO EXTEND DISCOVERY** on all parties to this action by the method(s) indicated below:

X by using the Court's CM/ECF Electronic Notification System addressed to:

Bradley T. Austin, Esq.
Paul S. Prior, Esq.
Theresa C. Trenholm, Esq.
SNELL & WILMER LLP
1700 South Pavilion Center Drive, Ste. 700
Las Vegas, Nevada 89135

DATED: This 2nd day of December, 2024.

/s/ Kylie B. VanderMiller
Employee of The Bourassa Law Group